

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROBERT SOKOLOVE, DAVID)	
MCCARTHY, WILLIAM SHIELDS,)	Case No. 05-514
and CITIZENS FOR REHOBOTH)	
BEACH, a political committee,)	
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF REHOBOTH BEACH,)	
DELAWARE and GREGORY FERRESE,)	
individually and as Manager of the City of)	
Rehoboth Beach, Delaware)	

NOTICE OF RULE 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. Rule 30(b)(6), counsel for plaintiffs will take the deposition(s) upon oral examination of defendant City of Rehoboth Beach, Delaware by one or more of its officers, directors, managing agents, or other persons who consent to testify on its behalf, with respect to matters known or reasonably available to the City of Rehoboth Beach, Delaware as set forth in Exhibit A. The deposition(s) will commence on (To Be Determined - April 12 or 13, 2006 at 10:00 a.m.) at the offices of Murphy Spadaro & Landon, 1011 Centre Road, Suite 210, Wilmington, Delaware 19805. The deposition(s) will be recorded by video, sound and/or stenographic means and will continue from day to day thereafter, until completed. A deponent's testimony in response to this deposition notice pursuant to Rule 30(b)(6) shall not limit plaintiffs' rights to seek a substantive deposition from the same deponent at a later date.

MURPHY SPADARO & LANDON

/s/ Roger D. Landon

ROGER D. LANDON, ID No. 2460

CHASE T. BROCKSTEDT, ID No. 3815

PHILIP T. EDWARDS, ID No. 4393

1011 Centre Road, #210

Wilmington, DE 19805

(302) 472-8100

Attorney for Plaintiffs

Robert Sokolove, David McCarthy
and William Shields

March 10, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROBERT SOKOLOVE, DAVID)	
MCCARTHY, WILLIAM SHIELDS,)	Case No. 05-514
and CITIZENS FOR REHOBOTH)	
BEACH, a political committee,)	
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF REHOBOTH BEACH,)	
DELAWARE and GREGORY FERRESE,)	
individually and as Manager of the City of)	
Rehoboth Beach, Delaware)	

CERTIFICATE OF SERVICE

I, Roger D. Landon, Esq., do hereby certify that on this 10th day of March, 2006,
two copies of the foregoing **NOTICE OF RULE 30(b)(6) DEPOSITION OF**
DEFENDANT were delivered via First Class Mail to the following individual(s):

Daniel A. Griffith, Esquire
Marshall Dennehey Warner
Coleman & Goggin
1220 Market Street, 5th Floor
P.O. Box 8888
Wilmington, DE 19899-8888

Todd C. Schiltz, Esquire
Wolf Block Schorr and Solis-Cohen LLP
Wilmington Trust Center, Suite 1001
1100 North Market Street
Wilmington, DE 19801

MURPHY SPADARO & LANDON

/s/ Roger D. Landon
ROGER D. LANDON, ID No. 2460
CHASE T. BROCKSTEDT, ID No. 3815
PHILIP T. EDWARDS, ID No. 4393
1011 Centre Road, #210
Wilmington, DE 19805
(302) 472-8100
Attorney for Plaintiffs
Robert Sokolove, David McCarthy
and William Shields